



January 9, 2023

VIA ECF

The Honorable Victor Marrero
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

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Re: National Coalition on Black Civic Participation et al. v. Wohl et al., No. 20-cv-8668

Dear Judge Marrero:

On behalf of all Plaintiffs in the above-referenced action, we write to notify the Court of Defendants' guilty plea to telecommunication fraud in *The State of Ohio v. Jacob Wohl and John Burkman* (CR-654013-A and CR-654013-B) on October 24, 2022. Attached for the Court's convenience are the transcripts of the guilty plea and sentencing (Exhibits 1 and 2, respectively). Defendants were charged in a fifteen-count indictment for criminal conduct that arises out of the same facts as the above-captioned case. Specifically, defendants pleaded guilty to telecommunications fraud, a felony in the fifth degree, "accept[ing] accountability and responsibility for" the false and inflammatory robocall¹ that the defendants sent to Ohio voters leading up to the 2020 election. *See* Ex. 1 at 4-5; Ex. 2 at 10.

Respectfully submitted,

/s/ Franklin Monsour Jr.
Franklin Monsour Jr.

CC: All counsel of record (via ECF)

¹ The robocall was the same Project 1599 robocall as is the subject of the above-captioned case.